

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

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KATHRYN KNOWLTON et. al.,

Plaintiff,

Case No. 20-CV- 01660

v.

CITY OF WAUWATOSA et. al.,

Defendants.

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**DECLARATION OF KIMBERLEY CY. MOTLEY**

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I, Kimberley Cy. Motley, declare under penalty of perjury that the foregoing is true and accurate:

1. I am one of the attorneys responsible for the representation of Plaintiffs in this case.
2. I have created the table in the Motion for Partial Summary Judgment that can be found on page 11 based upon information and belief the deposition testimony of Dominick Ratkowski on 6/23/21 and 7/26/21 as well as based upon the Exhibit 1 Target List.
3. I have created the abridged table in the Motion for Partial Summary Judgment that can be found on page 23 based upon information contained in Exhibits 12 & 13.
4. I have reviewed Plaintiff's Motion for Partial Summary Judgment against Defendants City of Wauwatosa et al in the above captioned case and have reviewed several documents that are attached as exhibits to this Declaration.
5. Exhibit 1 - Target List – as Redacted by Joseph Roy
6. Exhibit 2 - Joseph Roy 7/27/21 Deposition transcript
7. Exhibit 5 – 10/6/20 Dominick Ratkowski email to Christin Berges
8. Exhibit 6 - Ratkowski Deposition on 6/23/21

9. Exhibit 7 - 11/10/2020 Dominick Ratkowski email to Jodi Borchardt and Rachel Seils
10. Exhibit 8 - 1/7/21 Joseph Roy Email
11. Exhibit 9 - Dominick Ratkowski Deposition 7/26/21
12. Exhibit 10 - 9/24/2020 Dominick Ratkowski email to Brian Conte
13. Exhibit 11 - 11/10/2020 Dominick Ratkowski email to Andrew Willis and Susan Conley
14. Exhibit 12 - Open Records Requests
15. Exhibit 13 - Defendants Table of Open Records Disclosures
16. Exhibit 14 - Defendants Response to PL 4<sup>th</sup> Set of Discovery
15. Exhibit 15 - 7/13/2020 Dominick Ratkowski email to Adam Behnke
16. Exhibit 16 - 12/5/22 - Jeffrey Farina Response to PL 2<sup>nd</sup> Set of Interrogatories served on June 26, 2021, Interrogatory No. 1.
17. Exhibit 17 - 072621 Defendant Ratkowski Response to Interrogatory No. 1
18. The following exhibits have been filed under seal:
19. Exhibit 3 – 48 Plaintiffs Redacted Citations Disclosed by Joseph Roy.
20. Exhibit 3 - 48 Plaintiffs Unredacted Citations Disclosed by Joseph Roy
21. Exhibit 4 – 50 pages of Plaintiffs Redacted Police Reports Disclosed by Joseph Roy
22. Exhibit 4 – 50 pages of Plaintiffs Unredacted Police Reports Disclosed by Joseph Roy
23. Exhibit 1 – Target List unredacted

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this 19<sup>th</sup> day of December, 2022.

/s/ Attorney Kimberley Cy. Motley  
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